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U.S. Department of Justice

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Civil Division*

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December 26, 2024

Via CM/ECF

Hon. Sarah Netburn
United States Magistrate Judge
Southern District of New York
40 Foley Square, Room 430
New York, NY 10007

Re: *Justina Gamboa v. Commissioner of Social Security*
Civil Action No. 1:24-cv-05237-LJL
Joint Letter Request for Extension of Deadlines

Dear Judge Netburn:

This Office represents Justina Gamboa, the plaintiff in this matter. We write respectfully with Defendant to request an extension of the deadlines for filing the Plaintiff's brief and subsequent briefing in the above-referenced Social Security case, pursuant to the Standing Order, *In re Briefing of Social Security Cases*, M 10-46, issued on November 18, 2022 (the Standing Order).

Pursuant to the Supplemental Rules for Social Security Actions effective December 1, 2022, the certified administrative record (CAR) was admitted into the record on October 29, 2024. Plaintiff's brief is due December 30, 2024. Defendant's brief is due February 28, 2025 and Plaintiff's reply brief is due March 21, 2025. *See* Supp. R 4, 6-8. Given scheduling issues, and in accordance with the Standing Order, the parties have conferred about a proposed

extension and modification of the comprehensive schedule for future filings in this case. This request is being made due to large caseloads and Plaintiff's counsel inexperience with preparing Plaintiff's briefs. The parties respectfully request that the Court approve the following proposed schedule:

- Plaintiff's brief shall be filed by January 29, 2025;
- Defendant's brief shall be filed by April 29, 2025; and
- Plaintiff's reply shall be filed by May 20, 2025.

This is the first request for an extension of the filing deadlines from the plaintiff in this case. Special Assistant U.S. Attorney, Padma Ghatage has reviewed and consented to the above schedule proposal. There was an earlier request for extension of time for the defendant to file the administrative request and plaintiff consented to that request. Plaintiff does not anticipate a second request to file their brief.

We thank the Court for its consideration of this request.

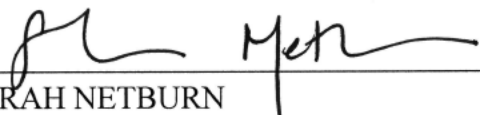
This Respectfully submitted,

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The Court ADOPTS the proposed briefing schedule.

SO ORDERED.

Dated: December 27, 2024
New York, New York


SARAH NETBURN
United States Magistrate Judge